

## REMARKS

Claim 12 is amended to correct a reference number. The subject matter of cancelled claim 11 from which claim 12 previously depended, has been incorporated into claim 1. Therefore reference to claim 1 is now proper.

Claim 17 is amended to require all six types of clickstream data and to specifically point out that the conversion rate is for the opportunity delivered in claim 1 from which claim 17 depends indirectly. Support is found on page 13, first paragraph of Applicant's Specification. No new matter is entered.

Claim 12 stands rejected under 35 U.S.C. 112, second paragraph, due to insufficient antecedent basis. As amended above, claim 12 now depends on claim 1 which provides the proper antecedent basis.

Claims 1 - 3, 6, 9, 12 - 18, 20 - 23 stand rejected under 35 U.S.C. 102(e) as being anticipated by Roberts (U.S. Patent No. 6,101,486). Applicant respectfully traverses the rejection and offers the following arguments in support thereof.

Applicant respectfully wishes to point out that her claim 1 requires creating a vision of a supplier's core competencies based on said constraints of said point of contact, said profiled past, and said current actions. An opportunity must then be created consistent with said vision by merging together and optimizing said vision with said supplier's channel awareness. Roberts does not describe creating a vision nor does he describe creating an opportunity consistent with said vision by the merging and optimizing recited in claim 1. Claim 1 is therefore

allowable over Roberts for this reason alone.

Furthermore, the vision of claim 1 must be created based on constraints of said point of contact. The opportunity must then be delivered to said user indirectly based on said constraints. Roberts does not describe creating a vision based on these constraints. Nor does he describe delivering an opportunity based (indirectly) on these constraints. Claim 1 is therefore allowable for this reason alone.

Independent claims 21, 22, and 23 all recite similar steps to claim 1 and are therefore allowable for the same reasons just given. All of the remaining dependent claims, depend directly or indirectly on allowable claim 1 and are therefore also allowable.

Finally, claim 17, as amended above, requires that the conversion rate of said opportunity be retrieved as clickstream data which is part of current actions. Roberts does not describe or suggest use of a conversion rate as recited in Applicant's claimed invention. Claim 17 is therefore allowable over Roberts.

Claims 4, 5, 7, and 8 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Roberts in view of Lee (U.S. Patent No. 6,829,475). However, as noted above, these claims are all dependent on allowable claims and are therefore also allowable. Withdrawal of this rejection under 35 U.S.C 103(a) is respectfully requested.

The Application is deemed in condition for allowance and such action by the Examiner is urged. Should differences remain, however, which do not place one/more of the remaining claims in condition for allowance, the Examiner is requested to phone the

undersigned at the number provided below for the purpose of providing constructive assistance and suggestions in accordance with M.P.E.P. Sections 707, 707.07(d) and 707.07(j) in order that allowable claims can be presented, thereby placing the application in condition for allowance without further proceedings being necessary.

Respectfully submitted,

Dated: 08/23/05

By: John Pivnichny  
John R. Pivnichny  
Reg. No. 43,001

Telephone: (607) 429-4358  
Fax: (607) 429-4119